

EXHIBIT 382

REDACTED

In the Matter Of:

In Re - Google Digital Advertising

NITISH KORULA

November 03, 2023



1 UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF NEW YORK

3
4 IN RE GOOGLE DIGITAL) Civil Action No.
5 ADVERTISING ANTITRUST) 1:21-md-03010-PKC
6 LITIGATION)
7)

8

9

10

11

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13

14 VIDEO RECORDED EXAMINATION OF

15 NITISH KORULA

16

17 TAKEN ON

18

FRIDAY, NOVEMBER 3, 2023

19

20

21

22

CERTIFIED STENOGRAPHER:

23 JESSIE WAACK, RDR, CRR, CCRR, NYRCR, NYACR,
CCR-NJ (No. 30XI008238700) CSR-TX (No. 11958)
24 CCR-WA (No. 21007264), CSR-CA (No. 14420),
REALTIME SYSTEMS ADMINISTRATOR
25 JOB NO.: 915335

1

5

A. [REDACTED]

6

Q. And after September 2019, was

7

there any way for a publisher to remove the

8

temporary CPM calculated by EDA from the

9

reserve price?

10

A. No. There is no way for them

11

to -- for publishers to do that. I can't

12

actually imagine anyone wanting to do, but,

13

no, there's no way to do it.

14

Q. So if AdX has \$4 and \$6 bids for

15

September 2019, it would run a second-price

16

auction?

17

A. It would run a -- prior to

18

September 2019, AdX would run a

19

second-price auction.

20

Q. And if its two highest bids were

21

\$4 and \$6, that auction would clear at

22

\$4.01?

23

A. Yes. Not necessarily and \$0.01.

24

The logic around that is a little bit

25

complicated. Also there are currency

REPORTER CERTIFICATE

I, the undersigned, do hereby certify:

That NITISH KORULA was by me duly sworn in the within-entitled cause; that said deposition was taken at the time and place herein named; and that the deposition is a true record of the witness's testimony as reported by me, a disinterested person, and thereafter was transcribed.

I further certify that I am not interested in the outcome of the said action, nor connected with, nor related to any of the parties in said action, nor to their respective counsel.

IN WITNESS WHEREOF, I have hereunto set my hand this 6th day of November, 2023.

Signature: Requested Waived Not Requested



JESSICA R. WAACK

Registered Diplomat Reporter

Certified Realtime Reporter

California Certified Realtime Reporter

New York Realtime Court Reporter

New York Association Court Reporter

Notary Public, State of New York

CCR-NJ (No. 30XI008238700) CSR-TX (No. 11958)

CCR-WA (No. 21007264), CSR-CA (No. 14420)

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ERRATA SHEET FOR THE TRANSCRIPT OF NITISH KORULACase Name: *In re Google Digital Advertising Antitrust Litigation*, No. 1:21-md-03010-PKC (S.D.N.Y.).

Dep. Date: November 3, 2023

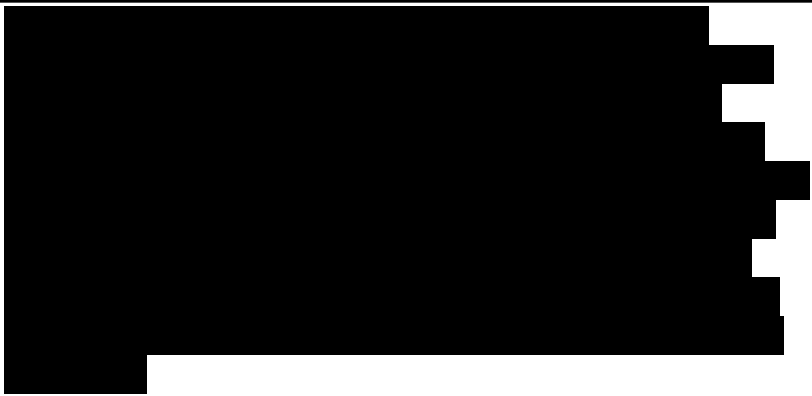
Deponent: Nitish Korula

Page	Line	Corrections	Reason for Correction
16	22	The phrase “other ways” should be the word “otherwise”	Transcription error
17	2	The phrase “finish your answers” should read “complete your answers”	Transcription error
24	10	The word “yes” should be deleted	Transcription error
38	13	The phrase “December 2021?” should read “December 2021.”	Typographical error
42	15	The phrase “Can you repeat the question.” should read “Can you repeat the question?”	Typographical error
43	17	The phrase “that is requested” should read “that it is requested”	Typographical error
49	9-10	The phrase “Can you repeat the question.” should read “Can you repeat the question?”	Typographical error
50	9	The phrase “when assessing subject of” should read “when assessing subjective”	Transcription error
50	16	The phrase “more than it actually was” should read “more than it truly was”	Transcription error
58	4	The phrase “it seems to be, yes” should read “It seems to be, yes”	Typographical error
63	24	The phrase “does not” should read “is not”	Transcription error
68	11	The phrase “different styles and how” should read “different styles in how”	Transcription error
69	12	The phrase “individuals, things that I did” should read “individual things that I did”	Transcription error
68	14	The phrase “I do know” should read “I don’t know”	Transcription error
87	17-18	The phrase “I do not what” should read “I do not know what”	Transcription error
88	12-13	The phrase “are referred to auxiliary materials” should read “refer to auxiliary materials”	Transcription error
94	12	The phrase “promotion to a level” should read “promotion to the level”	Transcription error
100	16-18	The phrase “is a matter of opinion. But” should read “as a matter of	Transcription error

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Page	Line	Corrections	Reason for Correction
		opinion, but”	
101	5	The word “Xander” should read “Xandr”	Typographical error
101	5	The phrase “offered buy-side” should read “offered sell-side”	Transcription error
101	6	The phrase “and sell-side” should read “and buy-side”	Transcription error
102	23	The phrase “I don’t work in publishers” should presumably read “I don’t work at publishers”	Transcription error
103	6	The word “Distribution” should read “Description”	Transcription error
110	6	The phrase “I generally” should read “I genuinely”	Transcription error
112	9	The phrase “and a lot” should read “and a bunch”	Transcription error
114	9	The phrase “may have one” should read “may have won”	Transcription error
116	8-9	The phrase “Can you repeat the question, please.” should read “Can you repeat the question, please?”	Typographical error
124	24	The phrase “Was he a survey” should read “Was he a supervisor”	Transcription error
127	12	The phrase “DoubleClick Ad Manager” should read “DoubleClick Bid Manager”	Transcription error
135	17	The phrase “I can assist” should read “I can list”	Typographical error
141	16	The phrase “facilitate compensation” should read “facilitate competition”	Transcription error
143	23	The phrase “no availability” should read “no ability”	Transcription error
145	7	The phrase “as opposed a” should read “as opposed to a”	Transcription error
146	3	The phrase “per-impression basis” should read “a per-impression basis”	Transcription error
152	13	The phrase “unable to put” should read “unable to”	Transcription error
166	22-23	The phrase “assigns AdX a CPM” should read “assigns AdX a static CPM”	Transcription error
172	17	The phrase “directly sought” should be “directly sold”	Transcription error
172	25	The word “remenant” should be spelled “remnant”	Typographical error
176	23	The word “Yes” should be deleted	Transcription error
178	8	The phrase “run an auction were” should read “run an auction where”	Typographical error
178	9-10	The phrase “reserve price to buyers and to --” should read “reserve prices -- to buyers until”	Transcription error
179	8	The word “ultimate” should read “alternate”	Transcription error

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Page	Line	Corrections	Reason for Correction
181	1	The phrase “a manager” should read “an engineer”	Transcription error
184	13-20		Transcription error
185	2	The phrase “mention of an special” should read “mention of an internal”	Transcription error
185	21	The word “architected” should read “architected”	Typographical error
189	7	The word “tenths” should read “tens”	Typographical error
226	19	The phrase “joining as” should read “joining Ads”	Typographical error
227	22	The phrase “an AdX serves” should read “an AdX ad serves”	Transcription error
233	14	The phrase “retrained. It’s buy-side algorithms.” should read “retrained its buy-side algorithms.”	Transcription error
235	22	The phrase “that is right” should read “that is derived”	Transcription error
246	2	The phrase “semantic for” should read “semantic or”	Transcription error
246	10	The phrase “is instructed” should read “is structured”	Transcription error
249	8	The phrase “third-party sides” should read “third-party sites”	Transcription error
255	12	The word “there” should be deleted	Transcription error
256	16	The word “be” should be “win”	Transcription error
259	23	The phrase “also important time” should read “also put in time”	Transcription error
266	15	The phrase “specifically will cause DV 3” should read “specifically it will cause DV 3”. The phrase should also be in quotes.	Transcription & typographical errors
267	5	The word “impresses” should read “impressions”	Transcription error
276	3	The word “moving” should be “removing”	Transcription error
283	11	The phrase “prior to September 2016” should be “prior to September 2019”	Transcription error
285	10	The word “limited” should be “omitted”	Transcription error
290	10	The phrase “publishers have valued CPMs” should read “publishers set value CPMs”	Transcription error

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Page	Line	Corrections	Reason for Correction
295	21	The phrase “for AdX bids to be” should read “for AdX bids to beat”	Transcription error
300	4	The phrase “were guaranteed” should read “with guaranteed”	Transcription error
308	5-6	The phrase “budget constraint” should read “budget-constrained”	Transcription error
319	18	The phrase “some would often” should read “somewhat often”	Transcription error
327	12	The phrase “go together” should read “blur together”	Transcription error
330	5-6	The phrase “and even this at the time” should read “and even less at the time”	Transcription error
335	15	The phrase “publishers in Google” should read “publishers and Google”	Transcription error
341	6	The sentence “Sorry was I speaking a little fast” should be punctuated “Sorry, was I speaking a little fast?”	Typographical error
351	1	The phrase “go terminus” should read “coterminous”	Typographical error
352	6	The phrase “were directly sold reserved ad campaigns” should read “were directly sold, reserved ad campaigns”	Transcription error
353	25	The word “DSP” should be “DFP”	Transcription error
354	3	The word “DSP” should be “DFP”	Transcription error
354	22	The phrase “reporting functionality somewhat limited” should read “reporting functionality is somewhat limited”	Transcription error
355	5	The phrase “which access control” should read “rich access control”	Transcription error

I have inspected and read my deposition and have listed all changes and corrections above, along with my reasons therefore.

Date: 12/4/2023

Signature: _____

DocuSigned by:

 979FE5617530433...